

Ein cyf/Our ref: CAS-246936-Y3Z2
Eich cyf/Your ref: P/2023/0896

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Date: 23 January 2024

Dear Sir/Madam,

PROPOSAL: CHANGE OF USE OF BUILDING FROM CLASS A2 (OFFICE) TO CLASS D1 (PHYSIOTHERAPY PRACTICE)

LOCATION: BUILDERS YARD, RIVULET ROAD, WREXHAM, LL13 8DY

Thank you for consulting Cyfoeth Naturiol Cymru (CNC)/Natural Resources Wales (NRW) about the above, which we received on 17 January 2024.

We have no objection to the proposed development as submitted and provide the following advice.

Flood Risk

The planning application proposes change of use from class A2 (office) to D1 (physiotherapy), retaining its classification as less vulnerable development. Our Flood Risk Map confirms the entrance of the site to be within Zone C2 of the Development Advice Map (DAM) contained in TAN15 and the Flood Map for Planning (FMfP) identifies the entrance to the application site to be at risk of flooding and falls into Flood Zone 2/3 (Rivers).

Given the scale and nature of the proposed development (and in the absence of a flood consequences assessment) we consider the proposals could be acceptable, subject to the developer being made aware of the potential flood risks and advised to install flood-proofing measures as part of the development. The application site is surrounded by fluvial flood risk, and events greater than the design event could affect the site. We therefore recommend that consideration be given to the incorporation of flood resistance/resilience measures into the design and construction of the development. These could include flood barriers on ground floor doors, windows and access points, implementation of suitable flood proofing measures to the internal fabric of the ground floor and locating electrical sockets/components at a higher level above possible flood levels.

We refer the applicant to our website for further advice and guidance. Additional guidance including the leaflet "Prepare your Property for flooding". The developer can also access advice and information on protection from flooding from the ODPM publication 'Preparing

for Floods: Interim Guidance for Improving the Flood Resistance of Domestic and Small Business Properties’.

We advise your Authority to liaise with the Lead Local Flood Authority (LLFA) to ensure that the River Gwenfro watercourse corridor is not compromised and any access requirements that the LLFA require are retained

Protected Sites and Foul Drainage

We note the application site is within the catchment of the River Dee and Bala Lake Special Area of Conservation (SAC). As you are aware, on the 21st January 2021, we published an evidence package outlining phosphorus levels for all river SACs across Wales. In line with our [Planning Advice](#) (August 2023), under the Habitats Regulations, Planning Authorities must consider the phosphorus impact of proposed developments on water quality within SAC river catchments.

However, the application as submitted is unlikely to increase the amount of phosphorus entering the catchment. Therefore, we are satisfied that the proposal is not likely to have a significant effect on the River Dee and Bala Lake SAC.

Protected Species

We note that there is no information about protected species with the application and, therefore, are assuming that your Authority has screened the application and concluded that there is not a reasonable likelihood of protected species being present.

Historic Landfill

According to our records the proposed development site is located near to land that is, or has been, used for the deposition of waste material. We would therefore advise you to consult with your Authority's Environmental Health and Building Control Departments, as they may hold detailed records, and may wish to make appropriate recommendations in respect of landfill gas investigation/remedial work. The developers should be made aware of the existence of the landfill site(s) so that they can decide whether or not to make their own investigations into the presence of landfill gas. It should also be noted that Waste Management Paper 27 states "It has been found that many sites which have taken only supposedly 'inert' waste have produced gas".

Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yours faithfully

Ruth Prichard

Cynghorydd - Cynllunio Datblygu/Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.